

1 FRIEND & WALTON
2 A PROFESSIONAL LAW CORPORATION
3 RANDALL K. WALTON, ESQ. (SBN: 155175)
4 ANN MARIE FRIEND, ESQ. (SBN: 173473)
5 P.O. Box 830
6 Modesto, California 95353-0830
7 Telephone: (209) 238-0946
8 Facsimile: (209) 238-0953

9
10 **Attorneys for Debtors,**
11 Narkyitta Bradley

12 UNITED STATES BANKRUPTCY COURT

13 EASTERN DISTRICT OF CALIFORNIA

14 MODESTO DIVISION

15 IN RE:) Case No: 09-25638
16 Narkyitta Bradley) Chapter: 7
17 Debtor.) DC No.: FW:08
18 _____) Date: August 11, 2010
19) Time: 10:30 a.m.
20) Place: 1200 I Street
21 Suite 4
22 Modesto, CA

23 **MOTION TO ABANDON PERSONAL PROPERTY - DEBTOR'S BUSIENSS**

24 Debtor, Narkyitta Bradley, hereby requests, pursuant
25 to Federal Rules of Bankruptcy Procedure, Rule 6007(b), an order
26 abandoning the debtor's business, a sole proprietorship known as
27 "New Attitude Hair Design," for the reasons set forth in the
28 declaration of Debtor, filed concurrently herewith.

This motion is supported by the Notice and Declaration
of the Debtor, and is based upon Federal Rules of Bankruptcy
Procedure, Rule 6007(b). This motion is also based upon the
following facts, all of which are stated in the Declaration of
Debtor filed in support of this motion:

1 The Debtor's business, New Attitude Hair Design,
2 consists of the following property:

3 A. Four dryer chairs, three dryers, two shampoo bowls, three
4 stations with chairs, three mirrors and lounge, curling
5 irons, blow dryer, three floor mats, accessories,
6 shampoos, and conditioners.

7 B. Good will of no more than \$2,000.00.

8 The debtors exempted all of the property listed above,
9 plus an additional \$2,000.00 to cover any good will or
overlooked assets.

10 My attorney will send the Chapter 7 Trustee copies of my
11 2008 & 2009 Personal and Business income tax returns. Tax
12 returns show the Business made a gross income of \$27,755.00,
13 with Business expenses totaling \$16,818.00, and a net business
14 income of \$10,937.00 for 2009.

15 Tax returns show the Business made a gross income of
16 \$27,516.00, with Business expenses totaling \$16,335.00, and a
17 net business income of \$11,181.00 for 2008.

18 Based on these facts and applicable law, the debtors
19 allege that this property is of no value, or at most, of
20 inconsequential value to the estate.

21 Therefore, the Debtors respectfully request the
22 Court grant this motion to compel abandonment.

23 RESPECTFULLY SUBMITTED:

24 DATED: July 7, 2010

25 **FRIEND & WALTON**
26 **A PROFESSIONAL LAW CORPORATION**

27 /s/ Randy K. Walton Esq
28 **RANDALL K. WALTON, ESQ., Attorney for**
debtor Narkyitta Bradley